

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

AUG 24 2015
U.S. DISTRICT COURT
MID. DIST. TENN.

Herbert Ray England

(Name)

201000020726

(Prison Id. No.)

(List the names of all the plaintiffs filing
this lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

(Name)

(Prison Id. No.)

Civil Action No. _____
(To be assigned by the Clerk's Office.
Do not write in this space.)

Plaintiff(s)

v.

JURY TRIAL REQUESTED ☐ YES ☒ NO

Lonnie Couch

(Name)

Division of Government of
TN. (Name) Responsible

(List the names of all defendants
against whom you are filing this
lawsuit. Do you use "et al." Attach
additional sheets if necessary.)

Defendant(s)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Herbert Ray England
Prison I.D. No. of the first plaintiff: WCSD: 201000020726
Address of the first plaintiff: 408 Century Court
Franklin Tennessee 37064

Status of Plaintiff: CONVICTED (☐) PRETRIAL DETAINEE (☒)

2. Name of the second plaintiff: _____
Prison I.D. No. of the second plaintiff: _____
Address of the second plaintiff: _____

Status of Plaintiff: CONVICTED (☐) PRETRIAL DETAINEE (☐)

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Lonnie Couch
Place of employment of the first defendant: CARL'S Body Shop

First defendant's address: Forrester RIDGE ROAD
Lyles, Tennessee

Named in official capacity? ☐ Yes ☒ No
Named in individual capacity? ☐ Yes ☐ No

2. Name of the second defendant: State OF Tennessee: Louise Merritt
Place of employment of the second defendant: Centerstone

Second defendant's address: Hwy 100 Centerville
Tennessee (psychiatrist)

Named in official capacity? ☒ Yes ☐ No
Named in individual capacity? ☐ Yes ☐ No

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

II. JURISDICTION

- A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).
Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below:

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? Yes ☐ No ☒

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs _____

Defendants

2. In what court did you file the previous lawsuit? _____

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? _____

4. What was the Judge's name to whom the case was assigned? _____

5. What type of case was it (for example, habeas corpus or civil rights action)?

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) _____

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? _____

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) _____

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? Yes No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☐ Yes ☒ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. No

lawsuits against jails or prison in the State of
Tennessee

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☐ Yes ☒ No

(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)

D. Have you presented these facts to the prison authorities through the state grievance procedure? ☐ Yes ☐ No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? _____

2. What was the response of prison authorities? _____

F. If you checked the box marked "No" in question IV.D above, explain why not. _____

Does not involve or relate to incarceration

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ☐ Yes ☒ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ☐ Yes ☐ No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? _____

2. What was the response of the authorities who run the detention facility? _____

J. If you checked the box marked "No" in question IV.H above, explain why not. _____

Does not relate or pertain to incarceration

V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

RIGHT TO A TRIAL AND Being Detained For No Reason
Chemicals were prescribed and administered to severely
harm and terminate my life: State of Tennessee and individuals
listed on the separate piece of paper. Classified information
received from Lonnie Couch: Reason Unknown.

VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

(1.) Bonnie Couch - event took place in late 1980's - 2010 -
released classified information concerning chemicals or drugs
being administered by MTM HI By showing and explaining
the process in detail that was recorded on a Video Cassette.

(2.) State of Tennessee - Centerstone - Psychiatrist -
Louise Merritt - event took place while I was a
patient at Centerstone in 1990 - 2000 diagnosed with
a panic disorder AND Depression. Dr. Merritt had knowledge
that my colonopin was not colonopin AND demanded
the whereabouts of the prescription. She should not
have known that it was missing. Miss Merritt also
used Rite-Aid Drug store in Centerville, Tennessee
for these chemicals. Employee of Rite Aid that
filled the prescriptions was a Miss Collins of Pinewood
DAUGHTER of Nunnally Tn. Postmaster Steve Collins,

VII. RELIEF REQUESTED: State exactly what you want the Court to order each defendant to do for you.

PAY Herbert Ray England - 413-96-8843 a
total or lump sum OF 5.3 Million Dollars
in compensation, And to Release information
that I was An innocent person; FALSELY
Accused by MR. Lonnie Couch.

I request a jury trial. ☐ Yes ☒ No

VIII. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Herbert Ray England Date: 8-23-2015
 Prison Id. No. WCSD-201000020726
 Address (Include the city, state and zip code.): 408 Century Court
Franklin, Tennessee 37064

Signature: Herbert Ray England Date: 8-23-2015
 Prison Id. No. WCSD-201000020726
 Address (Include the city, state and zip code.): 408 Century Court
Franklin, Tennessee 37064

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER. Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.

List of Responsible Parties in this Civil-Law Suit

This list is the names of the People, Hospitals, and Tennessee State Government that responsible for delivery and administering drugs and or chemicals on the physical body of Herbert Ray England without a explanation or investigation of proper law enforcement agencies. No trial or hearing of any kind with the knowledge of Herbert Ray England was held. Herbert Ray England could not properly defend his self of these accusations; a violation of Civil-Rights.

1. Lonnie Couch - address is: Forester Ridge Road, Lyles, Tennessee 37098
 explanation of responsible party: Mr. Couch has given Herbert Ray England classified information by letting Mr. England view a recording of a process used by Middle Tennessee Mental Health Institute explaining in detail the chemicals or drugs that were used and ways of administering them by the hospital and other people for no apparent reason. Then releasing information to his supervisor that Mr. Ray England had the classified information Mr. Couch is the source and the start of this problem. Request of settlement \$ 250,000⁰⁰

2. State of Tennessee: Centerstone Mental Health Services - address is: Centerstone Shopping Plaza Centerville Tennessee 37033. Name of person responsible is. Dr. Louise Meith Psychiatrist or Psychologist at Centerstone in Centerville, Tennessee mid 1990's - 2000 wrote prescriptions of chemicals or drugs that were lethal. These prescriptions were filled by the Rite-Aid Pharmacy next door to Centerstone. Name of Pharmacist that filled the prescriptions is: Miss Collins daughter of Steve and Deborah Collins of Pinewood Tennessee. Steve Collins was Post Master of the Murfreesboro Post Office at this time. Request of settlement of Civil-Law Suit \$ 750,000⁰⁰

List of Names of Responsible People and Hospitals

3. Bill McDonald self employed - mortician - McDonald Funeral Homes Centerville Tennessee 37033. Had diagrams, when my wifes funeral services were held at McDonalds Funeral Home, that explained how these chemicals worked on the human body on every seat. Also supervised a conspiracy involving citizens of Hickman County swerving their vehicles and turning the headlights on and off blinking at Herbert Ray England while driving his personal vehicle. Bill McDonald also had knowledge of supervisors that were responsible for administering these chemicals, Requesting 1 million dollars for settlement of Civil Law Suit.
4. Christy Thornberry: Resident of Dickson and Hickman Counties administered a lethal dose of a chemical or drug by giving Herbert Ray England a strawberry Nestles Milt flavored drink at her home in the apartments before you get to Walmart on the left of road in Dickson Tennessee. Also asked questions about the process of the chemicals used at Middle Tennessee Mental Health but did not ask me how I received the information. I am requesting \$50,000.00 for settlement of Civil-Law Suit.
5. Earl Martin: Self employed carpenter and saw mill operator, address is: Primm Springs, Tennessee-Highway 7. Mr. Earl Martin asked Herbert Ray England in person face to face; why the accelerator was not working on me. I replied and quote myself, "It must not be strong enough." unquote. Mr. Martin had knowledge of the marks used on the containers of beverages that contained these chemicals. Mr. Martin gave instructions on these marks or symbols to Todd England, Jimmy Tidwell, Darryl Tidwell, Craig England, Chris Ragsdale. Requesting \$250,000 Dollars for settlement of Civil Law Suit.

Names of People and Hospitals Responsible

6. Jimmy Tidwell- address is: M & M Road Lyles, Tennessee 37098- Part Time Rural Postal Worker employed by the U.S. Post Office. Administered chemicals in beverages and assisted Todd England and Don England placing or putting chemicals in the faucet of Mr. Billy England Nunnally Tennessee Smith Road. Also entered the home of Herbert Ray England without permission on several occasions. Requesting \$75,000 Dollars for settlement of Civil-Law Suit
7. Todd England: employment unknown - address is: Friendship Lane Lyles, Tennessee 37098. Received instructions from Earl Martin on symbols or marks of beverages that contained lethal chemicals. Todd England was observed by Herbert Ray England putting a white moth ball looking substance in the faucet of Mr. Billy England, Smith Road Nunnally Tennessee. Also assisted Jimmy Tidwell administering beverages which contained lethal chemicals on several different occasions. Requesting \$75,000 for settlement of Civil Law Suit
8. Angie England - employment unknown - address is: Friendship Lane Lyles Tennessee 37098. Received knowledge how to administer and recognize marks on containers of lethal chemicals Also signed a A T & T phone book Lyles Area in the residence of Herbert Ray England. Permission was not given to enter my residence at any time for any of these people. Married to Todd England joint settlement of Civil-Law Suit

List of Names of People and Hospitals Responsible

9. Cris Ragrdale: Realtor License - address is: Ben Fly Road Bon Aqua Tennessee. Miss Cris Ragrdale has knowledge of chemicals that were administered on Herbert Ray England by association with Earl Martin, Angie England, and Lindsay Warren. Also may be guilty of administering these chemicals. Miss Cris Ragrdale also signed the same Lyles Area Phone Book that Angie England signed. Also entered the home of Herbert Ray England without permission. Requesting \$75,000

* Hospitals Responsible of *
Violations of Civil Rights

1. Humphrey County Medical Center - address is: Waverly Tennessee While visiting my brother Mr. Billy Malcolm England I was experiencing an unusual medical condition. My skin felt hotter than normal and itchy like I was allergic to something I told my brother and he thought it was nerves so I took me to the Humphreys County Hospital. The Humphreys County Hospital transferred me without my permission or my brother's to a Juvenile Detention Facility in the Middle of Nashville, Tennessee. This event took place in the late 1980's. Request exemption for testimony concerning people and division of Government Responsible in this Civil-Law Suit
2. Middle Tennessee Mental Health Institute: address is: Stewarts Ferry Pike Nashville Tennessee: I was experiencing an unusual nervous condition my wife Wanda K. England suggested that I go to Cumberland Heights for Rehab. I replied I am not addicted to anything but she replied "The services they use nerve pills and will help you so I admitted myself. I was transferred from Cumberland Heights to:

Hospitals Responsible for Violations of Civil Rights

Continued from page 4 - Middle Tennessee Mental Health Institute. Length of stay - 9 days - I was transferred to MTMHI from Cumberland Heights without permission from me knowledge was not given as why I was being transported, knowledge was not given to Herbert Ray England's destination of transport. I was given medication of large amounts several different types for 9 days. I believe I was falsely diagnosed with mental disorders or conditions by Middle Tennessee Mental Health Institute. Requesting \$750,000 for settlement of Law Suit.

3. Dickson Medical Association Horizon Emergency Room: address is Dickson County, Dickson Tennessee: The Dickson City Police refused to let Herbert Ray England leave the Hospital after an admittance complaining of a hurting in my side. A violation of Civil - Rights no crimes were committed by Mr. Herbert Ray England. I was detained by Dickson City Police officers and threatened with false criminal charges if I tried to leave the property. I was given an injection and awoke in the Shipping and Receiving Area of the Horizon Medical Hospital handcuffed and shackled to a gurney. I was then transported by Dickson City or County Police officers to Skyline Medical Hospital, Madison Tennessee. This event took place February 2010 - To March 2010 8 days at Skyline Medical Hospital. Requesting one million dollars in compensation of settlement of Law-Suit

Hospitals Responsible for Civil Rights Violations

4. Skyline Medical Hospital - address is : Madison Tennessee
 date of admission Feb 2010 - March 2010 8 days
 I was charged \$900⁰⁰ before I could be released from Skyline Medical Hospital. The bill was paid by check from my bank account of the First Federal Bank of Centerville, Tennessee 37033, I was held against my will or permission for a long time until I signed an admittance form was prescribed drugs unknown to me for 8 days. Requesting \$50,000⁰⁰ for settlement of Civil-Law Suit
5. Vanderbilt Hospital : address : Nashville, Tennessee :
 I was transported to Vanderbilt Hospital after my arrest June 12, 2010. While Herbert Ray England was admitted and handcuffed to a gurney; a man dressed in a Dr's or Physicians Coat identified himself as a surgeon who worked for Vanderbilt Hospital; squeezed a bullet lodged in the left arm of Mr. Herbert Ray England until he screamed several times being tortured by this person. No medical X-Rays No medications, No medical attention whatsoever was administered by any physician or nurse of Vanderbilt Hospital. My witness is Deputy Darryl Beard of the Hickman County Sheriffs Department, Charlotte Anderson of Williamson County; an unknown F.B.I Special Agent. I am asking 1 million dollars for cruel and unusual punishment, negligence, torture, and failure to provide safety while being in the care of Vanderbilt Hospital. My civil rights as a U.S. Citizen was violated.

To The Honorable Judges of the U.S. Court,

I am requesting criminal charges to be filed on the people responsible for attempted murder on Herbert Ray England from a time period of late 1980's to 2010 and prosecuted by the United States Court. I am requesting 5.3 Million Dollars in settlement of this Civil-Law Suit for: Violation of Civil Rights, Torture, Crimes against Nature, administering Chemicals in food, beverages, medication, and items bought at grocery stores in Middle Tennessee during this time period 1980-2010, Mental anguish Communication violations on personal television and radio. Placing Chemicals in necessary resources for survival of Human Life.

	Sincerely,
name:	Mr. Herbert Ray England
SSN:	413-96-8843
DOB	02-26-1953
WCSD ID No.	201000020726
TDL	42077127

* Special Notice: a toxicology report was requested by Judge Samuel Smith, a General Sessions Judge of Hickman County on Tuesday June 15, 2010, property of the Hickman County Judicial System at this time, proof of these chemicals is in the toxicology report.

name	Herbert Ray England
SSN	413-96-8843
DOB	02-26-1953
Date	8-23-2015